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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

ARIEL ABITTAN,  
  
 Plaintiff,  
  
 v.  
 LILY CHAO, et. al.  
  
 Defendants,  
  
 and  
 EIAN LABS INC.,  
  
 NOMINAL DEFENDANT.

YUTING CHEN,  
  
 Plaintiff,  
  
 v.  
 ARIEL ABITTAN, et. al.,  
  
 Defendants.

Case No. 20-CV-09340-NC  
 Filed: December 24, 2020

**JOINT STATUS UPDATE  
 REGARDING INITIAL  
 DISCLOSURES**

Judge: Hon. Nathanael Cousins

Case No. 21-CV-09393-NC  
 Filed: December 3, 2021

Pursuant to this Court's April 12, 2023 Order [ECF No. 182] in Case No. 5:20-CV-09340 (the "Abittan Case") and [ECF No. 82] in Case No. 5:21-CV-09393 (the "Chen Case"), Plaintiff Ariel Abittan ("Abittan") and Defendants Lily Chao, Damien Ding, and Temujin Labs Inc. (the "Abittan Case Defendants"), and Plaintiff Yuting Chen ("Chen") and Defendants Abraham Abittan, Rachel Abittan, Brian Abittan, Jacob Abittan, Alyssa Abittan, Eliana Abittan, Roy Graber, Tova Graber, and Realtime NY LLC (together with Abittan, the "Chen Case Defendants")<sup>1</sup> submit this joint status update regarding initial disclosures with a proposed agenda for the hearing set for April 26, 2023.

The parties have not resolved their dispute regarding initial disclosures. Per the Court's request, the parties intend to address their positions at tomorrow's hearing.

The parties propose the following agenda:

1. Chen Case:

- a. Damages deficiencies
- b. Personal residences of Yuting Chen and Damien Ding
- c. Location of documents

2. Abittan Case:

- a. Location of documents
- b. Declaration of Damien Ding

3. Additional discovery topics:

- a. Yuting Chen's improper use of "Attorney's Eyes Only" designation on documents
- b. Abittan's request for additional deposition time, over 7 hours, based on Yuting Chen's request and need for a translator.

Respectfully submitted,

**FREEDMAN NORMAND FRIEDLAND LLP**

**SAC ATTORNEYS LLP**

/s/ Brianna K. Pierce  
Brianna K. Pierce

/s/ James Giacchetti  
James Giacchetti

<sup>1</sup> The Chen Case Defendants, other than Ariel Abittan, do not consent to personal jurisdiction or waive any challenges to personal jurisdiction by filing this joint discovery letter.

*Attorneys for Abittan and the  
Chen Case Defendants*

*Attorneys for Chen and the Abittan  
Case Defendants*

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